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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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Dimov Associates LLC d/b/a Dimov Tax and CPA  
Services and Dimov Wasserman LLC,

Civil Action No.:  
1:25-cv-05410-KMW-AMD

Plaintiffs,

-against-

Marc Wasserman, David Kane and Selective Financial  
Solutions,

Defendants.  
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Plaintiffs' Counsel respectfully submit this Certification under penalty of perjury pursuant to 28 U.S.C. § 1746 in response to the Court's Text Order entered June 9, 2025, directing Plaintiffs to certify whether Defendants have any objection to the pending *pro hac vice* application of David Fish.

**I. STATUS OF DEFENDANTS' APPEARANCES**

As of the date of this Certification, only Defendant Marc Wasserman has appeared in this action. Defendants Kane and Selective Financial Solutions have not acknowledged service of process or otherwise appeared in this matter. None of the Defendants have timely responded to the Order to Show Cause entered in this action on April 28, 2025 (ECF No. 9), and served on Defendants in accordance with that Order.

## II. CONFERENCE WITH APPEARING DEFENDANT

On June 9, 2025, counsel for Plaintiffs conferred with Defendant Marc Wasserman regarding two matters: (1) the pending *pro hac vice* application of David Fish, and (2) Mr. Wasserman's request to adjourn the hearing (ECF No. 18).

### A. Hearing Adjournment Request

Plaintiffs do not oppose Mr. Wasserman's request to adjourn the hearing.

### B. *Pro Hac Vice* Application

Mr. Wasserman stated that he would be willing to consent to the *pro hac vice* application on the condition that he be permitted to personally pack up and retrieve his personal belongings from his former office at Plaintiffs' offices.

Plaintiffs respectfully declined this condition, including for the reasons set forth in its Complaint. Instead, Plaintiffs have informed Mr. Wasserman that they would cooperate with a third-party for the retrieval of his personal belongings.

## III. Correction to Notice of Motion

Plaintiffs also bring to the Court's attention that it has learned that the Notice of Motion for *pro hac vice* admission of David Fish (ECF No. 10) contains an inadvertent error. The Notice states that the motion will be made "on the consent of Defendants," which language was mistakenly carried over from a prior form and not deleted. It should have been, "on notice to Defendants."

**There is no consent from any Defendant to Mr. Fish's *pro hac vice* application.** As set forth above, Defendant Marc Wasserman has expressly withheld consent, and the non-appearing Defendants have not provided any consent. We respectfully apologize for this inadvertent error and any inconvenience it may have caused.

If the Court would prefer that Plaintiffs file a corrected Notice of Motion reflecting that the application is made “on notice to Defendants” rather than “on the consent of Defendants,” Plaintiffs will promptly do so upon the Court’s direction

#### **IV. CONCLUSION**

Based on the foregoing, Defendant Marc Wasserman does not consent to the *pro hac vice* application of David Fish. The non-appearing Defendants have not expressed any position regarding the application.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Monday, June 9, 2025

New York, New York

Respectfully submitted,

ROMANO LAW PLLC

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